

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.<sup>1</sup>

Chapter 11

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**FIRST AND FINAL APPLICATION OF CREATIVE PLANNING, LLC FOR  
ALLOWANCE OF FEES AS TAX ACCOUNTANT FOR THE DEBTORS FROM MAY  
23, 2025 THROUGH AUGUST 21, 2025**

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1. Jason Primus and Creative Planning, LLC (collectively, “Creative Planning”) make this first and final application for allowance of fees for professional services rendered as the tax accountant for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) between May 23, 2025 and August 21, 2025 pursuant to 11 U.S.C. § 330.

2. In support of this Application, Creative Planning respectfully states as follows:

**JURISDICTION**

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue

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<sup>1</sup> In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors’ address is c/o Lighthouse Management Group, Inc., 900 Long Lake Road, Suite 180, New Brighton, MN 55112 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”).

4. On June 6, 2025, the Debtors filed a joint Amended Chapter 11 Plan of Liquidation. (ECF No. 366, the “Plan”). On August 6, 2025, the Court entered an order confirming the Plan and substantively consolidating the Debtors’ assets, liabilities, and operations. (ECF No. 431.) Further, pursuant to the Plan, all assets of the Debtors were transferred to a Liquidating Trust (the “Liquidating Trust”) as of August 21, 2025 (the “Effective Date”) and Lighthouse Management Group, Inc. was appointed as the Liquidating Trustee (the “Liquidating Trustee”). (ECF No. 454.)

5. Pursuant to Article X(d) of the Plan and the order confirming the Plan, the Court retained jurisdiction to “grant or deny any applications for allowance of compensation or reimbursement of expenses authorized pursuant to the Bankruptcy Code or th[e] Plan for periods ending on or before the Effective Date.” (ECF Nos. 366, 431.)

6. Article 3.1.2 of the Plan requires that “[a]ll holders of professional fees and expenses claims . . . file and serve an application for final allowance of compensation and reimbursement of expenses accruing from the Filing Date to the Effective Date, no later than 30 days after the Effective Date.” (ECF No. 366.)

7. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court’s order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

### **BACKGROUND**

8. On May 2, 2025, the Debtors filed an application to employ Creative Planning as the tax accountant for the Debtors (ECF No. 283.) The Court approved the application to employ

Creative Planning on May 23, 2025. (ECF No. 324.) A copy of that order is attached as **Exhibit A**.

9. Creative Planning commenced its services to the Debtors on or around June 5, 2025. Creative Planning charged hourly rates for its services to the Debtors. The hourly rates for these services ranged from \$130.00 to \$450.00 per hour. (ECF No. 283.) These rates are customary and commensurate with the level of services provided.

10. This is Creative Planning's first and final application for allowance of fees under 11 U.S.C. § 331.

11. Creative Planning believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

12. The Liquidating Trustee has reviewed this application on behalf of the Debtors and the Liquidating Trust and has no objection to the amounts sought herein.

### **RELIEF REQUESTED**

13. By this application, Creative Planning requests final allowance of fees for professional services rendered during these Chapter 11 cases between May 23, 2025 and August 21, 2025 in the amount of **\$7,427.00**.

14. The professional services rendered by Creative Planning are detailed on the attached **Exhibit B**. Those services include the tasks specifically described below:

**Tax Issues: \$7,427.00<sup>2</sup>**

Services include preparing and reviewing the Debtors' 2024 tax returns.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Jason Primus	1.5	2025	\$425.00	\$637.50
Katherine Janorschke	8.3	2025	\$390.00	\$3,237.00
Joseph Frink	0.6	2025	\$225.00	\$135.00
Mack Sathre	14.2	2025	\$140.00	\$1,988.00
Alex Krumenauer	10.2	2025	\$140.00	\$1,428.00
<b>TOTAL</b>	<b>34.8</b>			<b>\$7,425.50</b>

Blended Hourly Rate:	\$135.80
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**TOTAL POSTPETITION FEES: \$7,427.00**

15. All services for which fees are requested by Creative Planning were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

16. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Creative Planning, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Creative Planning has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.


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<sup>2</sup> As shown on **Exhibit B**, each of the invoices were rounded up to the nearest dollar. Therefore, there is a slight difference in the invoice amounts and the hourly detail.

**WHEREFORE**, Creative Planning respectfully requests that the Court enter an order:

- A. Allowing Creative Planning's fees incurred between May 23, 2025 and August 21, 2025 in the amount of \$7,427.00;
- B. Authorizing the Liquidating Trust to pay Creative Planning such allowed postpetition fees and expenses on behalf of the Debtors;
- C. Allowing, on a final basis, all of Creative Planning's fees in these Chapter 11 cases through August 21, 2025, and granting administrative expense priority to such allowed fees; and
- D. Granting such other and further relief as may be just and proper.

Dated: September 12, 2025

  
\_\_\_\_\_  
Jason Primus, Partner, Director & CPA  
Creative Planning, LLC

Prepared with assistance from:

Dated: September 12, 2025

*/e/ Katherine A. Nixon*  
\_\_\_\_\_  
Steven R. Kinsella (#09514)  
Katherine A. Nixon (*pro hac vice* MN #0402772)  
**FREDRIKSON & BYRON, P.A.**  
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**ATTORNEYS FOR THE LIQUIDATING TRUST**

**AFFIDAVIT**

I, Jason Primus, a Partner, Director & CPA at Creative Planning, LLC, declare under penalty of perjury that the foregoing *First and Final Application of Creative Planning, LLC for Allowance of Fees as Tax Accountant for the Debtors from May 23, 2025 Through August 21, 2025* is true and correct according to the best of my knowledge, information, and belief.

Dated: September 12, 2025



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Jason Primus

**EXHIBIT A**

## CourtAlert® Case Management

**From:** ecf@ndb.uscourts.gov  
**Sent:** 5/23/2025 3:40:50 PM  
**To:** nate\_olson@ndb.uscourts.gov  
**Subject:** Ch-11 24-30281 EPIC Companies Midwest, LLC Order on Application to Employ

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**CAUTION: EXTERNAL E-MAIL**

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**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

**U.S. Bankruptcy Court**

**District of North Dakota**

Notice of Electronic Filing

The following transaction was received from slj entered on 5/23/2025 at 3:40 PM CDT and filed on 5/23/2025

**Case Name:** EPIC Companies Midwest, LLC

**Case Number:** [24-30281](#)

**Document Number:** [324](#)

**Docket Text:**

Order Approving Application to Employ Accountants Jason Primus, CPA, and Creative Planning, LLC, filed by the Debtors (Related Doc # [283]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. 329, 330. Applicant must also comply with Local Rules. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings. (Text order only). Signed on 5/23/2025 (slj)

The following document(s) are associated with this transaction:

**24-30281 Notice will be electronically mailed to:**



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**24-30281 Notice will not be electronically mailed to:**

AMEX TRS Co., Inc.  
c/o Becket and Lee LLP  
PO Box 3001  
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BBrager Bradford Capital Management, LLC  
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Jason Primus  
Creative Planning, LLC  
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**EXHIBIT B**



EC West Fargo, LLC  
400 10th St SE  
c/o Lighthouse Management Group, Inc  
900 Long Lake Road, Suite 180  
Minot, ND 58701

Date: 8/28/2025  
Invoice Number: 1266261  
Client: 1007859.004

*Please include invoice number on payment*

Progress billing through 8/20/2025 for preparation of 2024 tax return

Invoice Total: \$1,405.00  
Prior Balance: \$0.00  
Current Amount Due: \$1,405.00

Current	31 - 60	61 - 90	91 - 120	Over 120	Total
\$1,405.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,405.00

Click here for our [Form W-9](#)

Please remit payment to our lockbox below:

PO Box 950459  
St. Louis, MO 63195-0459  
(833) 431-2021

Payment is due immediately on receipt of this invoice.

A 1% monthly finance charge will be added to balances over 30 days.

A 25% collection fee will be imposed on any invoice sent to collections.



EOLA Capital, LLC  
400 10th Street SE  
c/o Lighthouse Management Group, Inc  
900 Long Lake Road, Suite 180  
Minot, ND 58701

Date: 8/28/2025  
Invoice Number: 1266262  
Client: 1007859.003

*Please include invoice number on payment*

Progress billing through 8/20/2025 for preparation of 2024 tax return

Invoice Total: \$1,116.00  
Prior Balance: \$0.00  
Current Amount Due: \$1,116.00

Current	31 - 60	61 - 90	91 - 120	Over 120	Total
\$1,116.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,116.00

Click here for our [Form W-9](#)

Please remit payment to our lockbox below:

PO Box 950459  
St. Louis, MO 63195-0459  
(833) 431-2021

Payment is due immediately on receipt of this invoice.

A 1% monthly finance charge will be added to balances over 30 days.

A 25% collection fee will be imposed on any invoice sent to collections.



EPIC Companies Midwest 2023, LLC  
400 10th Street SE  
c/o Lighthouse Management Group  
900 Long Lake Road, Suite 180  
Minot, ND 58701

Date: 8/28/2025  
Invoice Number: 1266263  
Client: 1007859.001

*Please include invoice number on payment*

Progress billing through 8/20/2025 for preparation of 2024 tax return

Invoice Total: \$896.00  
Prior Balance: \$0.00  
Current Amount Due: \$896.00

Current	31 - 60	61 - 90	91 - 120	Over 120	Total
\$896.00	\$0.00	\$0.00	\$0.00	\$0.00	\$896.00

Click here for our [Form W-9](#)

Please remit payment to our lockbox below:

PO Box 950459  
St. Louis, MO 63195-0459  
(833) 431-2021

Payment is due immediately on receipt of this invoice.

A 1% monthly finance charge will be added to balances over 30 days.

A 25% collection fee will be imposed on any invoice sent to collections.



EPIC Companies Midwest, LLC  
400 10th Street SE  
c/o Lighthouse Management Group, Inc.  
900 Long Lake Road, Suite 180  
Minot, ND 58701

Date: 8/28/2025  
Invoice Number: 1266264  
Client: 1007859.000

*Please include invoice number on payment*

Progress billing through 8/20/2025 for preparation of 2024 tax return

Invoice Total: \$2,735.00  
Prior Balance: \$0.00  
Current Amount Due: \$2,735.00

Current	31 - 60	61 - 90	91 - 120	Over 120	Total
\$2,735.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,735.00

Click here for our [Form W-9](#)

Please remit payment to our lockbox below:

PO Box 950459  
St. Louis, MO 63195-0459  
(833) 431-2021

Payment is due immediately on receipt of this invoice.

A 1% monthly finance charge will be added to balances over 30 days.

A 25% collection fee will be imposed on any invoice sent to collections.



EPIC Employees, LLC  
400 10th Street SE  
c/o Lighthouse Management Group, Inc  
900 Long Lake Road, Suite 180  
Minot, ND 58701

Date: 8/28/2025  
Invoice Number: 1266265  
Client: 1007859.002

*Please include invoice number on payment*

Progress billing through 8/20/2025 for preparation of 2024 tax return

Invoice Total: \$1,275.00  
Prior Balance: \$0.00  
Current Amount Due: \$1,275.00

Current	31 - 60	61 - 90	91 - 120	Over 120	Total
\$1,275.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,275.00

Click here for our [Form W-9](#)

Please remit payment to our lockbox below:

PO Box 950459  
St. Louis, MO 63195-0459  
(833) 431-2021

Payment is due immediately on receipt of this invoice.

A 1% monthly finance charge will be added to balances over 30 days.

A 25% collection fee will be imposed on any invoice sent to collections.

Status	Invoice Date	Client ID	Client Sub ID	Client Name	Invoice Number	Invoice Total	
Posted	8/28/2025	1007859	004	EC West Fargo LLC	1266261	\$ 1,405.00	
	WIP Date	Service Code Name	Staff	Hours	Hourly Rate	Total	Invoice Description
	6/5/2025	1065 Miscellaneous	Primus, Jason A	0.30	\$425.00	\$127.50	Down load info and move to Document, discussion with Katie, email to Renee
	6/11/2025	1065 Return Preparation	Sathre, Mack J	0.40	\$140.00	\$56.00	
	6/12/2025	1065 Return Preparation	Sathre, Mack J	2.00	\$140.00	\$280.00	
	6/18/2025	1065 Return Preparation	Krumenauer, Alex	2.90	\$140.00	\$406.00	
	6/23/2025	1065 Return Preparation	Krumenauer, Alex	0.20	\$140.00	\$28.00	
	6/24/2025	1065 Return Review	Janorschke, Katherine M	1.30	\$390.00	\$507.00	
						<b>\$1,404.50</b>	

Status	Invoice Date	Client ID	Client Sub ID	Client Name	Invoice Number	Invoice Total	
Posted	8/28/2025	17007859		003 EOLA Capital LLC	1266262	\$ 1,116.00	
	WIP Date	Service Code Name	Staff	Hours	Hourly Rate	Total	Invoice Description
	6/5/2025	1065 Miscellaneous	Primus, Jason	0.30	\$425.00	\$127.50	Down load info and move to Document, discussion with Katie, email to Renee
	6/10/2025	1065 Return Preparation	Sathre, Mack J	0.90	\$140.00	\$126.00	
	6/11/2025	1065 Return Preparation	Sathre, Mack J	1.20	\$140.00	\$168.00	
	6/11/2025	1065 Return Preparation	Sathre, Mack J	0.50	\$140.00	\$70.00	
	6/24/2025	1065 Return Review	Janorschke, Katherine M	1.60	\$390.00	\$624.00	
						<b>\$1,115.50</b>	

Status	Invoice Date	Client ID	Client Sub ID	Client Name	Invoice Number	Invoice Total	
Posted	8/28/2025	17007859		001 EPIC Companies Midwest 2023 LLC	1266263	\$ 896.00	
	WIP Date	Service Code Name	Staff	Hours	Hourly Rate	Total	Invoice Description
	6/5/2025	1065 Miscellaneous	Primus, Jason	0.30	\$425.00	\$127.50	Down load info and move to Document, discussion with Katie, email to Renee
	6/9/2025	1065 Return Preparation	Sathre, Mack J	0.50	\$140.00	\$70.00	
	6/9/2025	1065 Return Preparation	Sathre, Mack J	1.20	\$140.00	\$168.00	
	6/10/2025	1065 Return Preparation	Sathre, Mack J	1.00	\$140.00	\$140.00	
	6/24/2025	1065 Return Review	Janorschke, Katherine M	1.00	\$390.00	\$390.00	
						<b>\$895.50</b>	

Status	Invoice Date	Client ID	Client Sub ID	Client Name	Invoice Number	Invoice Total	
Posted	8/28/2025	17007859		000 EPIC Companies Midwest LLC	1266264	\$ 2,735.00	
	WIP Date	Service Code Name	Staff	Hours	Hourly Rate	Total	Invoice Description
	6/5/2025	1065 Miscellaneous	Primus, Jason A	0.30	\$425.00	\$127.50	Down load info and move to Document, discussion with Katie, email to Renee
	6/10/2025	1065 Return Preparation	Sathre, Mack J	2.90	\$140.00	\$406.00	
	6/10/2025	1065 Return Preparation	Sathre, Mack J	0.70	\$140.00	\$98.00	
	6/18/2025	1065 Return Preparation	Krumenauer, Alex	0.50	\$140.00	\$70.00	
	6/23/2025	Accounting Miscellaneous	Frink, Joseph M	0.60	\$225.00	\$135.00	Time spent assisting Alex with questions and issues. Checked capital account totals, looked at guaranteed payment issues, and also assisted with getting started on capital account rec. Offered advice and suggestions, as well as mentioned discussing some items with reviewer on the project to save time.
	6/23/2025	1065 Return Preparation	Krumenauer, Alex	6.60	\$140.00	\$924.00	
	6/25/2025	1065 Return Review	Janorschke, Katherine M	2.50	\$390.00	\$975.00	
						<b>\$2,735.50</b>	

Status	Invoice Date	Client ID	Client Sub ID	Client Name	Invoice Number	Invoice Total	
Posted	8/28/2025	17007859		002 EPIC Employee LLC	1266264	\$ 1,275.00	

WIP Date	Service Code Name	Staff	Hours	Hourly Rate	Total	Invoice Description
6/5/2025	1065 Miscellaneous	Primus, Jason A	0.30	\$425.00	\$127.50	Down load info and move to Document, discussion with Katie, email to Renee
6/9/2025	1065 Return Preparation	Sathre, Mack J	1.10	\$140.00	\$154.00	Set-up new client and engagement binder. Start Prep
6/9/2025	1065 Return Preparation	Sathre, Mack J	1.80	\$140.00	\$252.00	
6/18/2025	1065 Return Review	Janorschke, Katherine M	1.50	\$390.00	\$585.00	
6/24/2025	1065 Return Review	Janorschke, Katherine M	0.40	\$390.00	\$156.00	Finish Review
					<b>\$1,274.50</b>	
				<b>TOTAL \$</b>	<b>7,427.00</b>	



**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**NOTICE OF FIRST AND FINAL APPLICATION OF CREATIVE PLANNING, LLC  
FOR ALLOWANCE OF FEES AS TAX ACCOUNTANT FOR THE DEBTORS FROM  
MAY 23, 2025 THROUGH AUGUST 21, 2025**

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TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

1. **NOTICE IS HEREBY GIVEN** that Creative Planning, LLC, as the tax accountant for the Debtors, has filed its first and final application for allowance of fees, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **Friday, October 3, 2025, which is twenty-one (21) days from the date of the filing of this notice**. Any objections not filed and served may be deemed waived.

Dated: September 12, 2025



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Jason Primus, Partner, Director & CPA  
Creative Planning, LLC

Prepared with assistance from:

Dated: September 12, 2025

/e/ Katherine A. Nixon

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Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

**FREDRIKSON & BYRON, P.A.**

60 South 6<sup>th</sup> Street, Suite 1500

Minneapolis, MN 55402-4400

612.492.7000

skinsella@fredlaw.com

knixon@fredlaw.com

**ATTORNEYS FOR THE LIQUIDATING TRUST**